

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

V.

Carlos Jobany Castaneda Lechuga

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2024 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

U.S.C. Title 18 U.S.C. 2252, 2252A

Distribution of Child Pornography.

This criminal complaint is based on these facts:

See attachment A.

☒ Continued on the attached sheet.

/S/ Aaron Stein

Complainant's signature

Aaron Stein, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: _____

Judge's signature

City and state: Laredo, Texas

U. S. Magistrate Judge Diana Song Quiroga

Printed name and title

ATTACHEMNT A

IN RE: Carlos Jobany Castaneda Lechuga

I, Aaron Stein, declare and state as follows:

On or about November 25, 2024, a reliable foreign partner provided information to the Federal Bureau of Investigation's (FBI) Violent Crimes Against Children's (VCAC) Headquarters, located in Linthicum, Maryland, regarding numerous Child Sexual Abuse Material (CSAM) videos that appeared to have been produced in the United States of America. This material was being distributed and sold on the dark web, more specifically, from a dark web site known as "the Exchange".

The material provided to the FBI consisted of multiple videos portraying an adult male, engaged in sexual activity with different prepubescent children ranging from approximately six to ten years of age. One example of the videos provided is as follows:

File Name: N04504658_V1_Music_20241126

This video portrays an adult male and a prepubescent female child approximately seven to nine years of age. At the beginning of the video there is a caption that reads "Naughty Music Teacher". The adult male instructs the female child to take off her clothes. The adult male then sits on a bed and placed the naked female child on his lap, rubbing his hands over her naked body. The adult male places his hand over her naked vagina and buttocks. The adult male picks her up into the air and placed her legs over his pelvis while she is naked. The female child's genitalia is exposed multiple times throughout the duration of this video. At the end of the video the adult male reaches for and turns off the video camera. This video is approximately five minutes and fifty-six seconds long.

I reviewed the files that the reliable foreign partner and FBI VCAC Headquarters provided. These files depicted child pornography, as defined by 18 U.S.C. § 2256(8).

Using facial recognition software, FBI VCAC Headquarters was able to find a positive match on the adult male depicted in the video described above. This same adult male is seen with what appears to be different minor children in at least three different videos.

The FBI identified the adult male as CARLOS JOBANY CASTANEDA LECHUGA, who resides in Laredo, Texas. CASTANEDA is employed by a local university as a

Music teacher. It is also believed that CASTANEDA works by providing private music lessons.

On December 1, 2024, at approximately 2:10p.m., FBI Laredo executed a lawful search warrant at CASTANEDA's residence in Laredo, Texas. While the search warrant was being executed, Agents advised CASTANEDA of his rights and interviewed him. According to CASTANEDA, he has lives alone at his residence in Laredo, Texas. When asked about the dark web, CASTANEDA was aware of what it was.

CASTANEDA was shown a portion of the CSAM video described above. CASTANEDA recognized and identified the child victim featured in the CSAM video with CASTANEDA. CASTANEDA made remarks about this being an "incident" and he did not want to talk about it.

In the referenced video, CASTANEDA appears to turn on the recording device, that appears to be on some type of platform off of the floor. At the completion of the video, CASTANEDA appears to terminate the recording device. A camera and tripod stand were located inside of CASTANEDA's residence.

Agents interviewed those familiar with the house and showed them sanitized images of one of the videos distributed. Those familiar with the house believe the setting of the video was the house where CASTANEDA is currently living.

Agents seized CASTANEDA's electronic devices, which included his desktop, cell phone(s), and media drives from his home. CASTANEDA was informed he was under arrest. CASTANEDA was then transported to the Webb County Sherriff's Office for intake and processing.

Based on my experience and the aforementioned facts and observations, I believe there is probable cause that CARLOS JOBANY CASTANEDA LECHUGA. acted in violation of Title 18 United States Code Section 2251, 2252, 2252A